

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
ANITA MARIE DORSEY : **VIOLATION:**
: **18 U.S.C. § 924(a)(1)(A) (making a false**
: **statement to a federal firearms licensee - 1**
: **count)**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Koehler International Inc., d/b/a Eagle Arms Sport Shop, 9331 Hamilton Boulevard, Breinigsville, Pennsylvania 18031, FFL# 8-23-20407, possessed an FFL and was authorized to deal in firearms under federal law.
2. FFL holders were licensed, among other things, to sell firearms and ammunition. Various rules and regulations promulgated under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929), govern the manner in which an FFL holder may sell firearms and ammunition.
3. The rules and regulations governing FFL holders required that a person seeking to purchase a handgun fill out a "Firearms Transaction Record," ATF Form 4473. Part of the Form 4473 required that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she was the actual buyer of the firearm. The Form 4473 contained language warning that "[t]he federal firearms laws require that the individual filling out this form must be

buying the firearm for himself or as a gift. Any individual who is not buying the firearm for himself/herself or as a gift, but who completes this form, violates the law.”

4. A person who purchases a firearm for another person and falsely completes the Form 4473 is a "straw purchaser." Acting as a straw purchaser is referred to as “lying and buying.”

5. FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, to ensure that the person was not prohibited from purchasing a firearm.

6. On or about September 11, 2004, in the Eastern District of Pennsylvania, defendant:

ANITA MARIE DORSEY

knowingly made a false statement and representation with respect to the information required to be kept in the records of federally licensed firearms dealer, in connection with the acquisition of each of the firearms listed in the table below, in that, defendant DORSEY certified on the Department of Treasury Forms 4473, Firearms Transaction Record, that she was the actual buyer of the firearms listed in the table below, when in fact, as she knew, this statement was false and fictitious.

FFL	FIREARMS PURCHASED
Koehler International Inc., d/b/a Eagle Arms Sport Shop 9331 Hamilton Boulevard Breinigsville, Pennsylvania 18031 FFL# 8-23-20407	1 HiPoint, model JHP, .45 caliber pistol, serial number X421120 1 HiPoint, model JCP, .40S&W caliber pistol, serial number X715363

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

PATRICK L. MEEHAN
UNITED STATES ATTORNEY